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telephone numbers could be ported with a single relatively simple route index operation.

Second, because RCF requires set-up of two distinct calls, AT&T customers whose numbers are ported using RCF will experience increased post-dialing delay. Calls to ported numbers using route indexing would be delivered more efficiently, without the need for a call to a second number.

25. Third, using RCF to port numbers to business customers with direct inward dialing PBXs wastes switching capacity. Each central office switch has a finite number of ports for lines. Using RCF to provide number portability for businesses with PBXs serving multiple telephone stations will result in the substitution of multiple RCF lines for each DID trunk, which may lead to the premature exhaustion of switch capacity. (This problem, which seems particularly likely in dense business centers, caused one Bell Operating Company (BOC) to withdraw RCF and DID in favor of DNRI as a generic interim number portability offering for businesses.) Denying customers number portability pending the expansion of switch capacity would effectively foreclose meaningful competition.

26. Fourth, the number of RCF calls that can be processed at one time in a switch is also finite. Using RCF to port numbers to large business customers will tax this limit, leading to possible delay or denial of interim number portability.

27. Fifth, as the Commission noted, RCF cannot effectively serve customers with large call centers that receive many simultaneous calls to a single number. Number Portability Order, Appendix E (¶ 10). Although RCF can add additional call paths to

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accommodate the provision of call completion, RCF has a switch variable maximum limit of call paths, which makes it unsuitable for many inbound calling applications.

28. Sixth, as the Commission has also noted, RCF is extremely wasteful of numbering resources, because it uses a second "shadow number" for each directory number a customer ports. Using RCF to provide number portability for business customers will unnecessarily waste thousands of numbers and hasten number exhaust. Not only do route index solutions completely avoid this wasteful use of "shadow" numbers, they do so by porting the entire block of directory numbers with comparatively simple switch translation operations, which reduces the expense of implementation.

29. **Direct Inward Dialing**. Similarly, DID is not an acceptable alternative to route index solutions for porting numbers to medium and large business customers.⁷ It supports fewer capabilities, imposes greater post-dial delay, and requires costly, inefficient and unnecessary trunking arrangements.

30. Specifically, when DID is used to port numbers, SS7 signaling is lost. Because DID only supports analog multifrequency (MF) signaling, important functionalities, such as Caller ID, cannot be provided to the ported customer. An SWBT customer could

⁷ DID is a service generally provided for business customers with private branch exchanges (PBXs). Calls to any of the telephone extensions served by the customer's PBX are processed to the appropriate SWBT end office and from there routed over dedicated trunk groups to the customer's PBX, which in turn routes the calls to the appropriate extensions. DID can be used to provide a form of interim number portability for a customer who switches from SWBT to AT&T by treating AT&T's switch as if it were a customer PBX. Number Portability Order, Appendix E (¶ 11). (The path of a call to a telephone number ported using DID is depicted in Attachment 1.)

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switch to AT&T only by giving up existing and future features available from SWBT. Route index solutions preserve SS7 signaling.

31. Without SS7 signaling, AT&T would be further severely handicapped in competing to serve the large business customers who have ISDN PBX systems. If DID is used to port an ISDN PBX customer's directory numbers, the customer will lose the use of ISDN capabilities such as greater bandwidth, higher data throughput, and the ability to mix data and voice on the same lines on incoming calls. Thus, an SWBT customer could switch to AT&T only by giving up these important features and capabilities available from SWBT. Again, the route index solutions avoid these limitations, and preserve ISDN features.

32. The absence of SS7 signaling would also result in additional unnecessary post-dialing delay.⁸ SWBT customers will switch to AT&T only if they are willing to tolerate the additional post-dial delay. Although all interim number portability methods result in some post-dial delay, the incremental post-dial delay associated with DID trunks exceeds that associated with the route index number portability solutions by .84 (RIPH) to 1.36 seconds

⁸ Congress and the Commission have recognized the significance of excessive post-dialing delay. See 47 U.S.C. § 251(b)(3) (requiring carriers to provide, "with no unreasonable dialing delays," dialing parity and nondiscriminatory access to telephone numbers, operator services, directory assistance, and directory listing); Number Portability Order, at 8382 (¶ 56) (permanent number portability methodology should not increase dialing delay); In the Matter of Implementation of the Local Competition Provision of the Telecommunications Act of 1996, CC Docket Nos. 96-98, et al. (rel. August 8, 1996) Second Report and Order and Memorandum Opinion and Order (Second Report and Order) at 68-70 (¶¶ 156-62) ("unreasonable dialing delay" prohibition applies to all of the obligations in Section 251(b)(3), and requires that any dialing delay experienced by CLEC customers should be no greater than that experienced by customers of the LEC); 47 C.F.R. § 51.25.

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(DNRI).⁹ The additional delay would cause customers to perceive AT&T's service as inferior to SWBT's and is completely unnecessary.

33. Finally, DID imposes unnecessary, costly and inefficient trunking arrangements. When DID is used to provide interim number portability, AT&T's switch is treated as if it were a PBX and not a peer network. As a result, AT&T would need special direct trunks dedicated solely to number portability between its switch and each of SWBT's end offices to use DID to port telephone numbers. Unlike trunks used for route index solutions, DID trunks are one-way, MF signaling trunks and can only be used for ported calls. Consequently, they will become useless, stranded plant when permanent number portability is implemented. (It is highly unlikely that SWBT has any plan for reuse of such MF signaling trunks.)

34. Telecommunications customers will be forced to bear the expense of building and provisioning these number portability-only direct trunks. That expense is considerably greater than the expense required in the use of RIPH because: (1) the DID trunks generally can be used only for ported calls; (2) the number of personnel-hours required to install, provision, and monitor trunk facilities is substantially higher under DID due to the

⁹ The Commission rejected Query on Release as an acceptable form of permanent number portability in part because it would have resulted in a difference of 1.3 seconds in post dial delay on calls to ported and non-porting calls. The Commission specifically found that a difference of 1.3 seconds in this context was "significant" and further that the difference could be exploited in "truthful" advertising to unfairly impede competition. Reconsideration Order, at 15-16 (¶¶ 23-24).

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greater number of trunk groups required; and (3) installed DID trunks will become stranded capacity once permanent number portability is implemented.

35. Moreover, it is far from obvious that SWBT could provision the volume of trunks AT&T and other carriers would need to use DID to port numbers, particularly since SWBT will also need to satisfy its own trunking needs. The volume of trunks could be substantial. Assume, for example, that AT&T and a few other competitive carriers with a total of just 5 switches wanted to be able to port numbers from each of SWBT's 25 end offices in a particular MSA. Using DID, at least 125 direct trunks would be required immediately. In addition, since the DID trunks will be used solely for number portability, separate engineering will be required. In contrast, route index trunks for interim number portability will be additions to existing trunk groups, making implementation simpler. Without timely provision of the necessary trunks, AT&T and the other carriers would not be in a position to provide service. As a practical matter, in such circumstances AT&T could not even begin marketing efforts to targeted customers, since it would be unable to schedule an in-service date or would be forced to schedule a date too far in the future to be acceptable to most customers. (The relative merits and trunking efficiency of DID and RIPH are illustrated in Attachments 2 and 3).

36. **LERG Reassignment**: For the largest customers, those assigned an NXX block of 10,000 telephone numbers, LERG Reassignment is a satisfactory interim method of providing number portability. Because it can take as long as 75 days to implement a change in the Local Exchange Routing Guide, however, some form of route index number

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portability is essential to serving these large customers between the time they select AT&T to provide local service and the time the LERG Reassignment is completed. Today, all carriers use the LERG to identify the appropriate local exchange carrier end office switch to terminate calls to a particular telephone line. As the names suggest, using LERG Reassignment or NXX migration to provide number portability is no more complicated than substituting a code identifying AT&T's switch or that of another competitive local exchange carrier as the appropriate office for terminating calls to a particular NXX.

37. Although SWBT is willing to provide LERG Reassignment, its refusal to provide route index solutions effectively nullifies LERG Reassignment as a practical vehicle for number portability for the largest customers. If AT&T cannot use route index number portability in conjunction with LERG Reassignment, AT&T will be at a substantial competitive disadvantage in seeking to serve these very large business customers. Customers who would otherwise switch carriers will be dissuaded from doing so because they would have to remain fully connected to the SWBT network until they could confirm that all carriers had fully implemented the LERG updates. A possible 75-day delay doubtless would be unacceptable to many customers. Without route index number portability, therefore, AT&T will be unable to use LERG Reassignment to serve the customer class for which it is ideally suited.

38. SWBT's proposed charge for NXX Migration is another substantial obstacle to effective use of LERG Reassignment. See SGAT Appendix Pricing Schedule at 9

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(\$10,000 for each NXX migration).¹⁰ The charge is inconsistent with both the Act and the Commission's Orders, because it is neither competitively neutral nor cost-based. NXX assignment and reassignment reflect customer choices and demographic shifts within and between local exchange carriers. No charge beyond the cost of updating the appropriate routing databases (see SGAT, § IV(D)) should be charged to the second carrier. Assessing a new entrant a fee for winning customers in the marketplace is discriminatory and anticompetitive.¹¹

¹⁰ The same price appears in the pricing schedule of the ICG agreement. I cite SWBT's SGAT only for convenience, not to suggest that SWBT can satisfy its 271 obligations under "Track B" in Oklahoma.

¹¹ SWBT's responsibility for assigning NXX codes gives it substantial power to frustrate or delay competition in other ways as well. In the state 271 proceedings, Cox Communications of Oklahoma City complained that it had requested assignment of ten NXX codes on January 7, 1997, but was informed more than two months later by SWBT that it would not assign the codes. SWBT subsequently imposed a 10 code per month limit on the number of NXX codes it would assign to competitive local exchange carriers (CLECs) and required Cox to resubmit its application. See OCC Cause No. 97-64, Reply Comments of Cox Communications at 5-6. Imposing any such number rationing procedure only on competitive local exchange carriers would violate this Commission's express admonition to SWBT and other incumbent carriers that they must use "identical standards and procedures for processing all numbering requests, regardless of the identity of the party making the request." Second Report and Order, at 141 (¶ 334); see also 47 U.S.C. § 271(e)(1) (authorizing the Commission to establish a system for number administration that assures that numbers are made available on an "equitable basis"). In light of its overall experience with SWBT's number administration, Cox argued that the Oklahoma commission "should not only recommend denial of Southwestern Bell's request for interLATA relief on this basis, but also sanction the company for impeding the development of facilities-based competition." Reply Comments of Cox Communications at 6. As Cox explains it: "just as Cox has been authorized to provide local exchange service, Southwestern Bell has rescinded the telephone numbers which are necessary for Cox to compete." Id.

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C. ROUTE INDEX NUMBER PORTABILITY IS BOTH COMPARABLE TO RCF AND DID AND TECHNICALLY FEASIBLE

39. Any suggestion that SWBT has satisfied its local number portability obligations under the Act and the Commission's regulations is untenable. SWBT's refusal to use route index solutions, which in many cases will be the most efficient, cost effective and highest quality interim method for providing number portability to medium and large business customers, is inconsistent with the Act, as well as the explicit requirements of the Commission's regulations. SWBT's refusal to use route index solutions to provide interim number portability will seriously and unnecessarily impede competition.

40. RIPH and DNRI are "comparable" to RCF and DID in that each of them uses existing switching and network capabilities to provide number portability. None of them requires deployment of a new database, see Number Portability Order, Appendix E (§§10-12), or any significant investment in development of new hardware or software.¹² As the Commission noted, RIPH and DNRI are essentially derivatives of RCF and DID. Number Portability Order, Appendix E (§ 12). Each of these methods of providing interim number portability is software driven. In fact, RIPH and DNRI are based on the same route index capability that is generally used to provide DID service to PBX customers.¹³ Finally, like DID

¹² Each of the interim number portability solutions requires some effort. For example, while RCF and DID were provided as retail services, using them to provide number portability will require different operating procedures, forms, and the like. Similarly, while the route indexing capability is in the existing network and switches, until recently it was not used to provide number portability.

¹³ See, e.g., Direct Testimony of William Deere, filed on behalf of SWBT before the
(continued...)

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and RCF, RIPH and DNRI all require calls to be routed to SWBT's end-offices before being "ported" to AT&T's switch for termination.

41. Since the route index solutions use existing network and switch capabilities to provide number portability, they are clearly "technically feasible" as well. During negotiations, SWBT never claimed that route index solutions were not technically feasible. Indeed, arbitrators in Kansas and Missouri have ordered SWBT to provide number portability using RIPH and DNRI.¹⁴ BOCs and GTE have agreed or been ordered to provide route index number portability by state commissions in more than half the states in the country:

- BellSouth agreed to provide route index number portability in each of the nine states in which it provides local exchange service;
- US West agreed to provide route index number portability in the 14 states in which it provides local exchange service;

¹³ (...continued)

Corporation Commission of Oklahoma, Cause No. PUD 960000218, at 97 (admitting that "in its memory, the switch finds a route index that directs it to route the call to a trunk group to complete DID calls"). SWBT submitted similar testimony in proceedings in Arkansas, Kansas, Missouri, and Texas.

¹⁴ In the Matter of the Petition by AT&T Communications of the Southwest, Inc. for Compulsory Arbitration of Unresolved Issues with Southwestern Bell Telephone Company Pursuant to Section 252(b) of the Telecommunications Act of 1996, Docket No. 97-AT&T-290-ARB, Arbitration Order at 68-70 (Feb. 6, 1997 Kansas), aff'd, Docket No. 97-AT&T-290-ARB, Commission Order at 10 (Kansas SCC March 10, 1997); In the Matter of AT&T Communications of the Southwest, Inc.'s Petition for Arbitration Pursuant to Section 252(b) of the Telecommunications Act of 1996 to Establish an Interconnection Agreement with Southwestern Bell Telephone Company, Docket No. TO-97-40, Arbitration Order at 19-20 (December 11, 1996 Missouri).

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- Pacific Bell and GTE were ordered to provide route index number portability in California by the California PUC;
- Ameritech was ordered to provide route index number portability in Indiana by the Indiana PUC;
- GTE was ordered to provide route index number portability in Alabama, Florida, Missouri, South Carolina, Texas, and Virginia by the commissions in those states; and
- Sprint Local has agreed to provide route index number portability in the areas in which it provides local exchange service, subject to field testing with AT&T.

42. Since the route index solutions clearly are both "comparable" to RCF and DID and "technically feasible," SWBT must provide them in addition to RCF, LERG, or other methods of providing interim local number portability. SWBT's attempt to justify its refusal to provide route index number portability on the ground that this Commission found RCF and DID were the only "technically feasible" methods of providing number portability cannot withstand scrutiny. See Affidavit of William C. Deere ¶ 113.¹⁵ First, in the Number Portability Order, the Commission specifically described RIPH and DNRI, and characterized them as "derivatives" of RCF and DID. Number Portability Order, Appendix E (¶ 12).

¹⁵ As indicated above, the Oklahoma arbitrator declined to order SWBT to provide route index number portability apparently on this untenable basis, and the Oklahoma Corporation Commission adopted the arbitrator's decision on this point without elaboration. In any event, the arbitrator's decision is not supported by the evidence, and therefore cannot support SWBT's application. I assume the arbitrator and the Oklahoma commission would not reach the same conclusion today in light of the overwhelming contrary authority that has developed throughout the country. Finally, AT&T has filed suit against SWBT in the United States District Court for the Western District of Texas to obtain route index number portability in accordance with the Act and this Commission's regulations. AT&T Communications of the Southwest, Inc. v. Southwestern Bell Telephone Company, Inc., Civil Action No. A-97CA-029-SS (1997).

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Second, both the Commission's regulations and the Number Portability Order expressly recognize that there are methods of providing number portability that are "comparable" to RCF and DID and "technically feasible." See 47 C.F.R. § 52.27; Number Portability Order at 8409 (¶ 110). Third, even if it were true (and it most certainly is not) that either RIPH or DNRI was not technically feasible in July, 1996, it is beyond serious dispute that both are technically feasible today. The Commission specifically noted the obligation of SWBT and other carriers to offer new and improved number portability methods as they become available. Number Portability Order at 8412 (¶ 115).

43. Unless SWBT provides RIPH and DNRI, it has not satisfied the requirements of §§ 251(b)(2) and 271(c)(2)(B)(xi). In fact, SWBT already should have developed methods and procedures for provisioning RIPH and DNRI, including order forms, an electronic interface, and cost and pricing information, since it has been ordered to provide these services in Kansas and Missouri.

44. SWBT's refusal to use what in some, if not most, cases will be the most cost effective, efficient and highest quality interim methods of providing local number portability for medium and large business customers is wholly inconsistent with the Act and the Commission's regulation, and will impair AT&T's efforts to compete with SWBT. In effect, SWBT will force AT&T to choose between (1) building and provisioning direct trunk groups to each SWBT end office in advance, before AT&T has any local customers and before it has sufficient experience to estimate the likely volume of local traffic from particular central offices, (2) marketing services without having the direct trunks in place and taking the

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substantial risk that SWBT's delay in installing the trunks to AT&T's switch could alienate AT&T's new customers before AT&T even begins to provide service, and (3) forgoing competition for medium and large business customers in the local market until permanent local number portability is in place.

45. SWBT has offered no good reason for its refusal to provide route index number portability solutions; there is none. The Act and the Commission's regulation deny SWBT the power to delay or discourage competition in the local exchange market by simply refusing a request for a readily available, efficient, and cost effective interim method of providing number portability for business customers, solely because SWBT would prefer that its competitors use a more cumbersome, less efficient, and more costly alternative.

46. Under no circumstances could the promise of permanent number portability justify SWBT's refusal to provide technically feasible interim number portability methods in accordance with the Commission's regulations. As the Commission specifically recognized, permanent number portability is not likely to be fully implemented for years in significant parts of the country. For example, permanent number portability is not likely to be implemented in the Tulsa MSA until the fourth quarter 1998, and not until July, 1999 elsewhere in Oklahoma. It was for precisely these reasons that the Commission rejected the argument that it did not need to address interim number portability, and specifically required SWBT and other local exchange carriers to provide number portability using the best technically feasible interim methods. See Number Portability Order at 8406 & nn. 304 & 305 (¶ 105).

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47. SWBT's refusal to provide route index number portability solutions is flatly inconsistent with the requirements of the Act (including the competitive checklist) and the Commission's regulations. Unless SWBT provides RIPH and DNRI in addition to RCF and LERG Reassignment, it has not satisfied its duty to provide number portability with as little "impairment of functioning, quality, reliability, and convenience as possible," and its petition for authority to provide in-region interLATA services must be denied. See 47 U.S.C. § 271(c)(2)(B)(ix).

D. OTHER UNREASONABLE TERMS AND CONDITIONS

48. In addition to its unjustified refusal to provide route index number portability solutions, SWBT has undermined the usefulness and availability of the number portability options it purports to offer by imposing unreasonable terms and conditions. The most obvious are: (1) anticompetitive prices, (2) commercially unreasonable performance intervals for changeovers; and (3) unreasonable restrictions on availability of number portability.

49. First, the costs for interim number portability must be recovered on a "competitively neutral" basis. 47 U.S.C. § 251(e)(2); see Number Portability Order at 8417-8422 (¶¶ 128-136). SWBT proposes to recover 100% of the costs of interim number portability from AT&T and other competitive local exchange carriers. See SGAT Appendix Pricing Schedule at 7, 9. SWBT's pricing proposal is contrary to the explicit requirements of the Commission's Number Portability Order: "a cost recovery mechanism that imposes the entire incremental cost of currently available number portability on a facilities-based new

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entrant would violate [the Commission's first] criterion" for "competitively neutral" cost recovery. Number Portability Order at 8421 (¶ 134). As the Commission correctly recognized, imposing the entire cost of number portability on competing carriers and their customers will defeat local competition before it begins. See ¶ 38, supra (NXX migration pricing).¹⁶

50. Second, AT&T must have the ability to provide service promptly and without unnecessary disruption, if it is to compete in the local exchange market. When a customer selects AT&T to provide local service, but elects to retain his or her telephone number, the changeover should be largely transparent to the customer. Section XVI(A)(3) of the SGAT provides "performance criteria" SWBT will attempt to reach at least 80 percent of the time. For interim number portability, the proposed changeover intervals for interim number portability are five days for service orders involving 1-10 numbers; 10 days for service orders involving 11-20 numbers; and an interval "to be negotiated" for service orders involving more than 21 numbers.

51. The intervals for orders involving less than 20 numbers are commercially unreasonable and longer than SWBT tolerates for its own services. If SWBT meets its performance standard, one in five AT&T customers could wait more than five days

¹⁶ Although it is slightly garbled, Section II(C)(4) of Appendix Port suggests that SWBT plans to charge new entrants for intercept charges after the end user disconnects or is terminated from service. There is no technical or business rationale for requiring the new entrant to pay for intercept charges on a line wholly owned by SWBT. SWBT has clarified that these charges are applicable "only if the [competitive local exchange carrier] desires a special intercept referral announcement." Reply Comments of SWBT at 57 (March 25, 1997).

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for a service SWBT provides to its own customers in three days or less. Further, incumbent local exchange carriers throughout the country have adopted a three-day interval for changeovers for permanent number portability.¹⁷

52. Third, Section II(A)(3) of Appendix Port prohibits AT&T from ordering number portability service for a customer whose account is 45 days or more in arrears to SWBT. SWBT should not be permitted to hold a customer's telephone number hostage. Until the customer's number has been disconnected, it should be ported upon request.

II. INTRALATA TOLL DIALING PARITY

53. SWBT must "provide intraLATA toll dialing parity throughout [Oklahoma] coincident with its exercise of . . . authority" to provide in-region interLATA services. 47 U.S.C. § 271(e)(2)(A). SWBT "cannot offer intraLATA toll dialing parity within a state until [an] implementation plan has been approved by the appropriate state commission or the Commission." 47 C.F.R. § 51.213(a). IntraLATA toll dialing parity (or intraLATA 1+ dialing or intraLATA equal access) is thus one of the prerequisites to SWBT providing in-region interLATA toll service.

54. Mr. Kaeshoefer asserts that "[a]n intraLATA Toll Dialing Parity Implementation Plan will be filed with the [Oklahoma commission]" in accordance with the Act and the Commission's regulations, and that the "implementation plan fully meets the intraLATA toll dialing parity requirements of the Act and Order." Affidavit of Dale

¹⁷ The schedule for large custom orders necessarily will be negotiated, but generally should not exceed 10 days, if RIPH is available.

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Kaeshoefer ¶ 67; see also SWBT SGAT, Section VI(B)(2) ("SWBT agrees to make intraLATA dialing parity available in accordance with Section 271(e) of the [Act]").

55. Absent an approved implementation plan, however, SWBT cannot offer intraLATA toll dialing parity. SWBT has yet to submit a plan for implementing intraLATA toll dialing parity to the Oklahoma commission. SWBT has not implemented intraLATA toll dialing parity any of the five states in which it operates, so it has no prior experience on which to rely. For all that appears in the record at this stage, SWBT has no plan beyond promising compliance with the explicit requirements of federal law. There is simply no basis for the Commission to conclude that SWBT is prepared to offer intraLATA dialing parity coincident with its entry into the in-region interLATA market.

56. Although the Commission has offered broad guidelines, the details of implementing intraLATA toll dialing parity are likely to be as controversial in Oklahoma as they have been elsewhere. At some point before it offers in-region interLATA services, SWBT must submit a plan for implementation to be approved by the Oklahoma commission or by this Commission. That plan should be detailed and specific. For example, while it is settled that "full 2-PIC" should be the software delivery mechanism, intraLATA toll parity should extend to proprietors of all payphones, including those owned by SWBT. In addition, the plan should be driven to the NPA-NXX and Common Language Location Identifier (CLLI) office identification level, and should include counts of access lines involved in each of those

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offices. Dates of office conversion should be included in the plan. Cost and cost recovery also should be addressed in an implementation plan.¹⁸

57. SWBT's plan must be submitted, approved, and in place sufficiently far in advance of the date it proposes to offer interLATA services to give AT&T and other carriers an opportunity to order necessary facilities and give SWBT personnel sufficient time to provision the orders. But, no one yet knows what that plan is. Until the details of SWBT's plan for implementation of intraLATA toll dialing parity have been considered and resolved, SWBT cannot satisfy the requirements for interLATA relief.¹⁹ The only assurance that AT&T and other competitive local exchange carriers have of getting dialing parity "coincident" with

¹⁸ A few of the most significant aspects of cost and cost recovery that should be addressed in an implementation plan are the following:

(1) Costs should be incremental, rather than traditional, fully distributed costs, and the cost study methodology should be reviewed in advance of cost development.

(2) Costs should only include specific expenditures made to accommodate intraLATA toll parity (i.e., software, network, balloting and customer education, and administration and billing systems).

(3) Costs should be allocated among intraLATA toll carriers on a Minute-of-Use (MOU) basis, including SWBT MOUs. Since these costs are attributable to increased customer choice, they should be spread to all customers, and not just those of new intraLATA competitors. Since interLATA presubscription was paid for long ago, interLATA MOUs should not be considered in allocating costs among intraLATA carriers.

¹⁹ Requiring SWBT to demonstrate that it is prepared to comply with the command of Section 271(e)(2)(A) before addressing the multitude of complex legal, economic, and policy issues raised in this case is fully consistent with Section 271(d)(5), which prohibits the Commission from adding to the terms of the competitive checklist in Section 271(c)(2)(B). SWBT does not need to provide intraLATA toll dialing parity until it exercises any authority to offer interLATA services. Nothing in Section 271(d)(5), however, limits the Commission's authority to order its own procedures and deploy its resources most efficiently.

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SWBT's exercise of authority to offer interLATA services is strict enforcement of the requirements of Section 271.

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I declare under penalty of perjury that the foregoing is true and accurate to the best of my knowledge and belief.

Executed on April 28, 1997.



Mark Lancaster

SUBSCRIBED AND SWORN TO BEFORE ME this 28 day of April, 1997.



Notary Public

My Commission Expires:
MARCHETA A. RESCH
Notary Public - State of Missouri
Commissioned in Jackson County
My Commission Expires May 24, 1999

ATTACHMENT 1

INTERIM NUMBER PORTABILITY**1. REMOTE CALL FORWARDING**

Remote Call Forwarding (RCF) is an existing software defined feature of the central office (CO) switch that allows a call to a telephone number to ring to another telephone number. A call to a ported number is routed to the incumbent SWBT CO (from which service was previously provided), translated by that switch to the new number (assigned by AT&T), and routed through the SWBT access tandem switch to the AT&T CO for termination. This method requires the use of two (2) directory numbers, and is most useful for single-line residential single-line applications. RCF is illustrated in **Figure 1**, below.

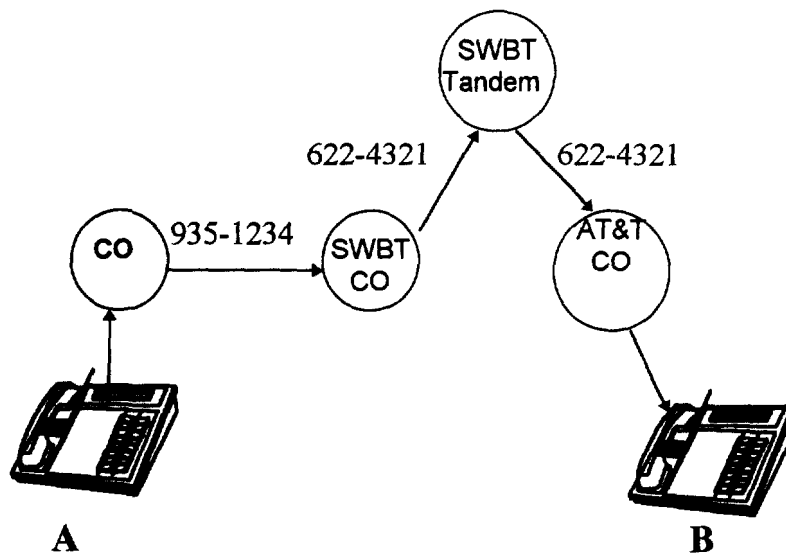


Figure 1 - Remote Call Forwarding

2. ROUTE INDEX-PORTABILITY HUB (RIPH)

Route Index-Portability Hub (RIPH) uses existing switching capabilities to redirect calls through an access tandem switch to a new entrant's switch.

In the following illustration, a call to a number ported using RIPH is routed to the SWBT CO, where a three digit 1XX prefix is added to the called number; the prefix identifies the new entrant (in this case, AT&T) and the switch to which the call should be ported. The call is then routed through the SWBT access tandem to AT&T's CO for termination. This solution is intended primarily for multi-line applications. RIPH is illustrated in Figure 2 below.

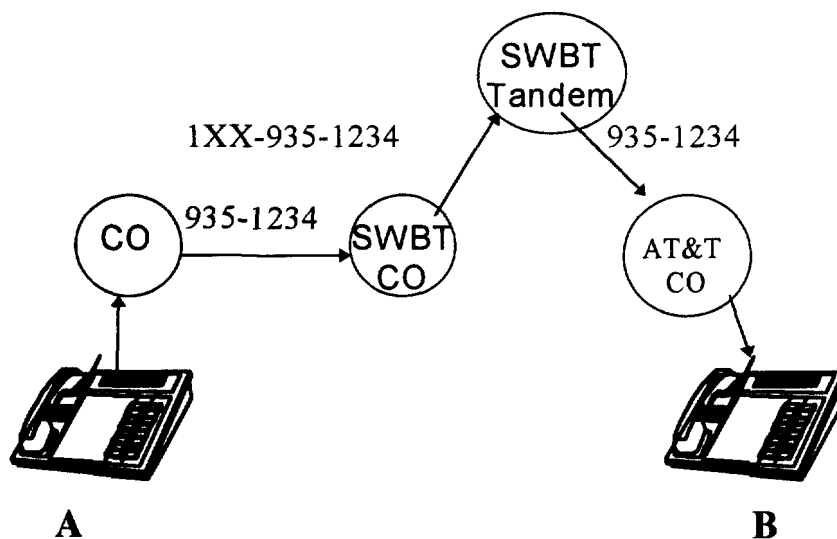


Figure 2 - Route Index - Portability Hub

Generally AT&T and other competitive local exchange carriers will connect to the incumbent LEC network at an access tandem. Consequently, interim number portability solutions, such as RIPH, which incorporate the efficiency of access tandem switching, are preferable to those that require direct trunks between the AT&T CO and the incumbent LEC's CO.

3. **DIRECTORY NUMBER - ROUTE INDEX**

Directory Number-Route Index (DNRI) and RIPH use similar switching technology to provide number portability. In contrast to RIPH, which routes calls through the SWBT access tandem, DNRI routes calls directly between the SWBT CO and the AT&T CO. This requires the placement of direct trunks between the SWBT CO and the AT&T CO. Where direct trunks are justified, DNRI may be acceptable. DNRI is illustrated in Figure 3, below.

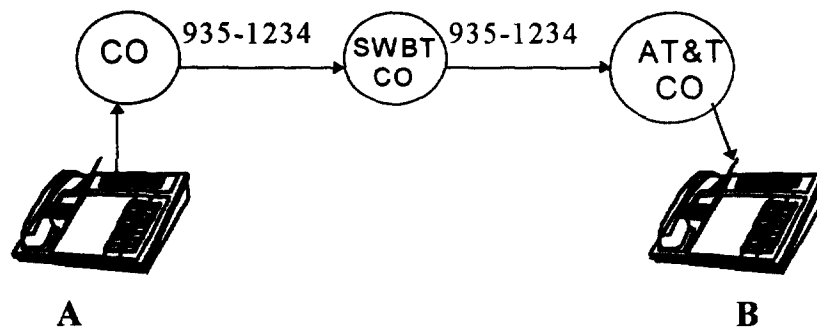


Figure 3 - Directory Number - Route Index

4. LERG REASSIGNMENT

LERG Reassignment uses the network table called the Local Exchange Routing Guide (LERG) to determine routing of geographic numbers. The LERG is managed by Bellcore, and is used by all carriers for routing instructions. LERG Reassignment permits calls to a particular NXX to be routed to a switch other than that of the carrier to which the NXX was originally assigned.

As depicted below, the originating switch (CO) would, through a change in its routing translations (based on what is published in the LERG), effectively recognize the AT&T CO as the owner of the 405-848-0000 through - 9999 number range. This solution transfers the default carrier of a number range from one carrier to another. LERG Reassignment is illustrated in Figure 4, below.

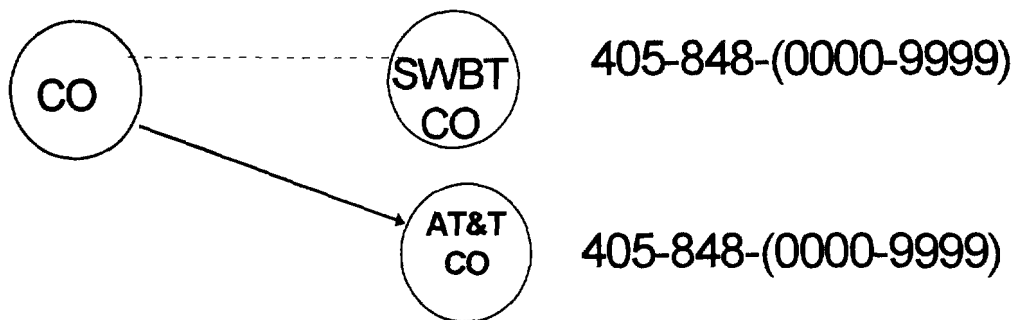


Figure 4 - Local Exchange Routing Guide (LERG) Reassignment

LERG Reassignment is a fully consumer-transparent portability that produces up to 10,000 (complete NXX) numbers. LERG activities are commonplace in the local exchange environment. Anytime a new NXX is opened today, LERG activities take place and assignments are distributed to all operating units under North American Numbering Plan (NANP) authority. LERG Reassignment would only be practicable for very large customers.

5. DIRECT INWARD DIALING (DID)

Although AT&T did not request DID, SWBT has offered to provide it. DID offers nothing that is not better provided by one of the four interim number portability options AT&T requested. The following description of DID is provided for comparison only.

DID is an existing retail service that allows business customers to have calls routed directly to individual phone sets behind a Private Branch Exchange (PBX) instead of to a PBX attendant. Using DID to provide number portability, a call to a ported number is first routed to the SWBT central office (from which service was previously provided), where it is routed, using route index translations over dedicated number portability-only trunks, to the new entrant central office (CO) switch for termination.

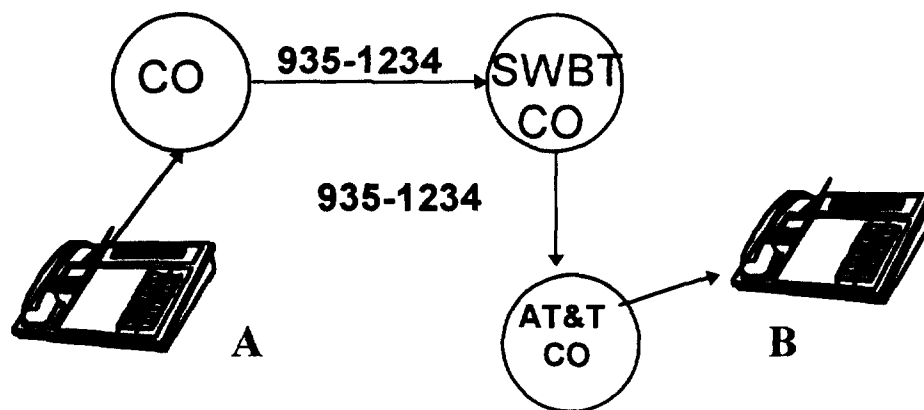


Figure 5 - Direct Inward Dialing (DID)

While the path of call to a number ported using DID looks similar to the path of a call ported with DNRI, there are important differences between the two. First, using DID the trunks between SWBT's end office and AT&T's switch can only be used for number portability, and the trunks will be stranded investment upon implementation of permanent number portability. Second, DID trunks do not support SS7 signaling